

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: 415 496 6723
Fax: 650 636 9251

ROVENS LAMB LLP
Steven A. Lamb (#132534)
(slamb@rovenslamb.com)
1500 Rosecrans Avenue, Suite 418
Manhattan Beach, CA 90266
Tel: 310 536 7830

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION.

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
STEVEN A. LAMB IN SUPPORT OF EX
PARTE APPLICATION PURSUANT TO
LOCAL BANKRUPTCY RULE 9006-1(C) FOR
AN ORDER MODIFYING DATES AND
DEADLINES REGARDING OBJECTION TO
CLAIM OF AMIR SHAHMIRZA AND
KOMIR, INC.**

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

DECLARATION OF STEVEN A. LAMB

I, Steven A. Lamb, declare as follows:

1. I am an attorney with the law firm of Rovens Lamb LLP and am one of the attorneys representing PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**,” or as reorganized pursuant to the Plan (as defined below), the “**Reorganized Debtors**”) and am counsel of record on behalf of **Reorganized Debtors** in the State Court action entitled, *Amir Shahmirza and Komir, Inc. v. PG&E Corporation*, San Mateo Superior Court Case 18CIV06064, filed November 9, 2018 (the “State Court Action”).

2. I have reviewed the Declaration of Lawrence A. Jacobson submitted in opposition to the Reorganized Debtors' *ex parte* request for a continuance of the present pretrial schedule to allow additional time to schedule and conduct a mediation and to respond to Claimant's second motion for summary judgment, if necessary.

3. Paragraph 20 of the Declaration of Claimant's Counsel states: PG&E conducted the deposition of Amir Shahmirza on October 12, 2023."

4. This statement is inaccurate and incomplete. Mr. Shahmirza was deposed in both his individual capacity and as the corporate representative of Komir, Inc.

5. The deposition was not completed and remains open. This was made clear on the record for the following reasons:

- a. Mr. Shahmirza acknowledged that there were documents in his possession that were not produced, despite the fact that they were requested. The production we received was not produced until less than 24 hours before the first session began on October 12th.
 - b. Counsel for Claimant instructed the witness not to answer certain questions and these remain open for a meet and confer and potential motion to compel.

- c. The witness was evasive and refused to answer simple yes or no questions numerous times during the first session of the deposition. I advised counsel for Claimant that I would review the transcript once we received it, and we would meet and confer and may have to file a motion to compel.
 - d. Counsel for Claimant acknowledged that the deposition is still open and that the witness will produce additional document(s) and submit to further examination once we receive further document(s).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 13th day of October 2023 at Torrance, California.

By: /s/ Steven A. Lamb
Steven A. Lamb